

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

INMOTION IMAGERY TECHNOLOGIES,  
LLC

Plaintiff,

V.

LFP VIDEO GROUP, LLC; METRO-GOLDWYN-MAYER INC.; SUMMIT ENTERTAINMENT, LLC; ELEGANT ANGEL, INC.; NEW SENSATIONS, INC., d/b/a VOUYER MEDIA, INC.; GIRLFRIENDS FILMS, INC.; WORLD WIDE RED LIGHT DISTRICT; ZERO TOLERANCE ENTERTAINMENT, INC.; JULES JORDAN VIDEO, INC.; ANABOLIC VIDEO PRODUCTIONS INC.; WEST COAST PRODUCTIONS, INC.; MEDIA PRODUCTS, INC., d/b/a DEVIL'S FILM; RK NETMEDIA, INC.; IMAGE ENTERTAINMENT, INC.; ECHO BRIDGE ENTERTAINMENT, LLC; LOOSE CANNON FILMS, INC.; and VANGUARD INTERNATIONAL CINEMA, INC.,

Defendants.

CIVIL ACTION NO. 2:11-cv-261

## JURY TRIAL DEMANDED

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiff InMotion Imagery Technologies, LLC (“InMotion”) and Defendant Platinum Disc LLC d/b/a Echo Bridge Home Entertainment (“Echo Bridge”), pursuant to Fed. R. Civ. P. 41 (a)(2) and (c), hereby move for an order dismissing all claims asserted by InMotion against Echo Bridge and all claims and counterclaims asserted by Echo Bridge against InMotion, in this action WITH PREJUDICE, subject to the terms of a confidential settlement, with each party to bear its own costs, expenses and attorneys’ fees.

Dated: April 30, 2012

Respectfully submitted,

**PLATINUM DISC LLC  
d/b/a ECHO BRIDGE  
HOME ENTERTAINMENT**

**INMOTION IMAGERY  
TECHNOLOGIES, LLC**

By: /s/ Peter J. Chassman  
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**ATTORNEY FOR DEFENDANT  
PLATINUM DISC LLC  
d/b/a ECHO BRIDGE  
HOME ENTERTAINMENT**

**ATTORNEY FOR PLAINTIFF  
INMOTION IMAGERY  
TECHNOLOGIES, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 30th day of April, 2012.

/s/ William E. Davis, III  
William E. Davis, III

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h), and that this motion is unopposed.

/s/ William E. Davis, III  
William E. Davis, III